



Via ECF

Hon. Margaret M. Garnett
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 906
New York, NY 10007

New York

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August 5, 2024

RE: *Google LLC v. Sun*, No. 1:24-cv-02559-MMG

Dear Judge Garnett:

We represent Plaintiff Google LLC and write, in accordance with §§ I(B)(5) and II(A)(5) of Your Honor's individual practices to respectfully request that the Court adjourn the initial pretrial conference, which is currently scheduled for August 8, 2024, indefinitely or, in the alternative, to a control date of September 9, 2024.¹

As of August 2, both Defendants have defaulted. Google effected service on Defendant Yunfeng Sun on May 31, 2024, and effected service on Defendant Hongnam Cheung on July 12, 2024. Under Federal Rule of Civil Procedure 12(a)(1)(A)(i), Sun's deadline to respond to the Complaint was June 21, 2024, and Cheung's deadline to respond to the Complaint was August 2, 2024. Neither Defendant has responded to the Complaint or otherwise appeared in this action.

Google intends to move for default judgment by September 6, 2024. Because Defendants were served and have failed to appear, Google has not contacted them to seek their consent.

Thank you in advance for your consideration.

Respectfully submitted,

/s/ Timothy T. Howard

Timothy T. Howard
Counsel for Plaintiff Google LLC

¹ The original date of the initial pretrial conference was June 13, 2024. At Google's request, the Court adjourned the conference to August 8. See ECF No. 22.

